

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Case No. 22 CR 274

Plaintiff,

JUDGE KNEPP

-vs-

AMANDA HOVANEC,

Defendant.

REQUEST FOR DISCOVERY

Kenneth Bailey (0090042)
Bailey Law Group
220 West Market Street
Sandusky, Ohio 44870
PH: (419) 625-6740
FX: (419) 625-2021
Ken@bailey.pro

David Klucas (0041188)
1900 Monroe Street
Toledo, Ohio 43604
PH: (419)255-1102
FX: (419)255-1415
Email: Davek@buckeye-access.com
Attorneys for Defendant Amanda Hovanec

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Defendant Amanda Hovanec, through counsel, respectfully requests discovery and inspection with the right to copy or photograph, where appropriate, the following materials:

1. Pursuant to Rules 16(a)(1)(A) & (B), all oral statements of the defendant, narrative summaries of oral statements of the Defendant, and written statements of the Defendant.

2. Pursuant to Rule 16(a)(1)(D), a copy of the Defendant's prior criminal record.
3. Pursuant to Rule 16(a)(1)(E), all documents, photographs, video, and other tangible objects intended for use by the Government as evidence on chief at trial.
4. Pursuant to Rule 16(a)(1)(F), all reports of examinations and tests intended for use by the Government as evidence on chief at trial.
5. Pursuant to Rule 16(a)(1)(G), the name(s) of any expert witness and the requisite summary of testimony the Government intends to utilize as evidence in chief at trial.
6. All evidence favorable to the Defendant on the issues of guilt or punishment.

Respectfully Submitted,

/s/ Kenneth Bailey
Kenneth Bailey

/s/ David Klucas
David Klucas
Attorneys for Defendant James Campbell

Certification

This shall certify that a copy of the forgoing was sent this 7th day of June, 2022, to all counsel of record via the Court's Electronic Filing System.

/s/ David Klucas
David Klucas